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*Attorneys for Defendants*

XINGKE ELECTRONICS (DONGGUAN) CO.,  
LTD., formerly known as SINCO  
ELECTRONICS (DONGGUAN) CO., LTD.,  
LIEW YEW SOON aka, MARK LIEW, NG  
CHER YONG. aka CY NG, and MUI LIANG  
TJOA aka ML TJOA

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SINCO TECHNOLOGIES PTE LTD.,

Plaintiff,

vs.

SINCO ELECTRONICS (DONGGUAN) CO.,  
LTD.; XINGKE ELECTRONICS  
(DONGGUAN) CO., LTD.; XINGKE  
ELECTRONICS TECHNOLOGY CO., LTD.;  
SINCOO ELECTRONICS TECHNOLOGY  
CO., LTD.; MUI LIANG TJOA (an  
individual); NG CHER YONG aka CY NG (an  
individual); and LIEW YEW SOON aka  
MARK LIEW (an individual),

Defendants.

Case No. 3:17-CV-05517-EMC

Action Filed: September 22, 2017

**DEFENDANTS' AMENDED DISCOVERY  
AND DEPOSITION DESIGNATIONS**

**Judge: Honorable Edward M. Chen**

**Trial: November 1, 2021**

Pursuant to the Court's September 28, 2021 Order (ECF 438), Defendants provide this amended designation of written discovery and deposition testimony for trial. For the Court's convenience, attached hereto as Exhibit A is a redline reflecting all changes.

Defendants hereby submit the following Discovery and Deposition Designations and provide notice of intent to read the following designated documents or transcripts or play the videos at trial. Defendants reserve the right to supplemental these disclosures, including to add designations for any witnesses that become unavailable for trial due to travel restrictions or otherwise.

**Written Discovery Designations**

Date	Discovery	Designated Responses
3/8/2019	Plaintiff SinCo Technologies Pte Ltd.'s Response to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Request for Admissions	Nos. 5-9 Nos. 31, 33, 35, 37, 39, 41, 43, 45, 47, 49 Nos. 51, 53, 55, 57, 59, 61, 63, 65, 67, 69 Nos. 91, 93, 95, 97, 99, 101, 103, 105, 107, 109 Nos. 111, 113, 115, 117, 119, 121, 123, 125, 127, 129 Nos. 130-134 Nos. 142-144 No. 152
3/15/2019	Plaintiff SinCo Technologies Pte Ltd.'s Responses to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Interrogatories to SinCo Technologies Pte Ltd.	No. 5 at 31:4-15, 31:18-27, 32:16-33:16 No. 12 at 46:7-9 No. 13 at 46:28. No. 16 at 49:17-19 No. 17 at 50:27-51:2 No. 18 at 52:10-12 No. 19 at 53:21-22 No. 20 at 55:10-13 No. 21 at 56:21-24 No. 22 at 57:19-22 No. 23 at 58:13-14
5/9/2019	Plaintiff SinCo Technologies Pte Ltd.'s Amended Responses to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Request for Admissions	Nos. 5, 6, 142, 143, 144

5/9/2019	Plaintiff SinCo Technologies Pte Ltd.'s Amended Responses to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Interrogatories to SinCo Technologies Pte Ltd.	No. 15 at 28:27-29:3
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### **Deposition Designations**

Defendants previously designated the deposition testimony of three witnesses: Minh Chi Nguyen, Jonathan Chee (both in his individual capacity and as a FRCP 30(b)(6) designee), and Bryan Lim, and incorporate those designations herein. However, insofar as Plaintiff has indicated its intent to call Minh Nguyen and Jonathan Chee to provide live testimony at trial, Defendants do not expect to rely upon deposition designations for these witnesses, other than for impeachment purposes as necessary; to the extent that Defendants do elect to play any further deposition testimony other than for impeachment purposes, Defendants do not expect that the total time for both cross-examination and deposition for any witness would exceed the current estimate of cross-examination time. Plaintiff has also indicated its intent to call Bryan Lim via recorded deposition testimony. Defendants' designations for Mr. Lim that do not overlap with Plaintiff's designations amount to less than 30 minutes of testimony (less than the 1 hour of cross-examination that Defendants had previously anticipated).

Dated: October 1, 2021.

ARNOLD & PORTER KAY SCHOLER LLP

By: /s/ Joseph Farris

JOSEPH FARRIS

*Attorneys for Defendants* XINGKE ELECTRONICS (DONGGUAN) CO., LTD., formerly known as SINCO ELECTRONICS (DONGGUAN) CO., LTD., LIEW YEW SOON aka, MARK LIEW, NG CHER YONG. aka CY NG, and MUI LIANG TJOA aka ML TJOA

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served a copy of the foregoing DEFENDANTS' AMENDED DISCOVERY AND DEPOSITION DESIGNATIONS via the Court's ECF system on October 1, 2021.

/s/ Joseph Farris

JOSEPH FARRIS

# **EXHIBIT A**

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**UNITED STATES DISTRICT COURT  
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Plaintiff,

vs.

SINCO ELECTRONICS (DONGGUAN) CO.,  
LTD.; XINGKE ELECTRONICS  
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ELECTRONICS TECHNOLOGY CO., LTD.;  
SINCOO ELECTRONICS TECHNOLOGY  
CO., LTD.; MUI LIANG TJOA (an  
individual); NG CHER YONG aka CY NG (an  
individual); and LIEW YEW SOON aka  
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**Judge: Honorable Edward M. Chen**

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Pursuant to the Court's September 28, 2021 Order (ECF 438), Defendants provide this amended designation of written discovery and deposition testimony for trial. For the Court's convenience, attached hereto as Exhibit A is a redline reflecting all changes.

Defendants hereby submit the following Discovery and Deposition Designations and provide notice of intent to read the following designated documents or transcripts or play the videos at trial. Defendants reserve the right to supplemental these disclosures, including to add designations for any witnesses that become unavailable for trial due to travel restrictions or otherwise. ~~These Discovery Designations were served on Plaintiffs and SinCo SG on September 3, 2021. Pursuant to the Court's Standing Order, Defendants will provide a hard copies of these documents upon completion.~~

**Written Discovery Designations**

Date	Discovery	Designated Responses
3/8/2019	Plaintiff SinCo Technologies Pte Ltd.'s Response to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Request for Admissions	Nos. <del>1 through 153</del> <u>5-9</u> <u>Nos. 31, 33, 35, 37, 39, 41, 43, 45, 47, 49</u> <u>Nos. 51, 53, 55, 57, 59, 61, 63, 65, 67, 69</u> <u>Nos. 91, 93, 95, 97, 99, 101, 103, 105,</u> <u>107, 109</u> <u>Nos. 111, 113, 115, 117, 119, 121, 123,</u> <u>125, 127, 129</u> <u>Nos. 130-134</u> <u>Nos. 142-144</u> <u>No. 152</u>
3/15/2019	Plaintiff SinCo Technologies Pte Ltd.'s Responses to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Interrogatories to SinCo Technologies Pte Ltd.	<del>No. 1 at 5:20-23, 6:2-9:21.</del> <del>No. 4 at 30:27-31:3.</del>  No. 5 at 31:4-15, 31:18-27, 32:16-33:16. <del>No. 6 at 34:13-15.</del> <del>No. 7 at 35:10-12.</del> <del>No. 8 at 36:22-24.</del> <del>No. 9 at 37:16-39:21, 40:1-25.</del> No. 12 at 46:7-9. No. 13 at 46:28. No. <del>14 at 47:20</del> <del>No. 15 at 48:6-7, 48:9-11.</del> <del>No. 16 at 49:14-19, 49:17-19</del> No. 17 at <del>50:25-51:2</del> <u>50:27-51:2</u>

		No. 18 at <del>52:8-12</del> <u>52:10-12</u> No. 19 at <del>53:19-22</del> <u>53:21-22</u> No. 20 at <del>55:8-13</del> <u>55:10-13</u> No. 21 at <del>56:18-24</del> <u>56:21-24</u> No. 22 at 57:19-22; No. 23 at 58:13-14; <del>No. 24 at 59:6-7.</del>
5/9/2019	Plaintiff SinCo Technologies Pte Ltd.'s Amended Responses to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Request for Admissions	Nos. 5, 6, 142, 143, 144, <del>145.</del>
5/9/2019	Plaintiff SinCo Technologies Pte Ltd.'s Amended Responses to Defendant XingKe Electronics (Dongguan) Co., Ltd.'s First Interrogatories to SinCo Technologies Pte Ltd.	<del>No. 6 at 6:9-16.</del> <del>No. 7 at 7:11-19.</del> <del>No. 8 at 9:9-17.</del> No. 15 at 28:27-29:3.

### Deposition Designations

Defendants previously designated the deposition testimony of three witnesses: Minh Chi Nguyen, Jonathan Chee (both in his individual capacity and as a FRCP 30(b)(6) designee), and Bryan Lim, and incorporate those designations herein. However, insofar as Plaintiff has indicated its intent to call Minh Nguyen and Jonathan Chee to provide live testimony at trial, Defendants do not expect to rely upon deposition designations for these witnesses, other than for impeachment purposes as necessary; to the extent that Defendants do elect to play any further deposition testimony other than for impeachment purposes, Defendants do not expect that the total time for both cross-examination and deposition for any witness would exceed the current estimate of cross-examination time. Plaintiff has also indicated its intent to call Bryan Lim via recorded deposition testimony. Defendants' designations for Mr. Lim that do not overlap with Plaintiff's designations amount to less than 30 minutes of testimony (less than the 1 hour of cross-examination that Defendants had previously anticipated).



<b>Deposition of Minh Chi Nguyen August 24, 2018</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	5	25	6	8	
Affirmative	8	1	9	8	
Affirmative	9	10	9	17	
Affirmative	9	19	9	21	
Affirmative	9	24	10	1	
Affirmative	10	13	10	24	
Affirmative	11	22	13	12	
Affirmative	14	6	14	10	
Affirmative	14	13	14	14	
Affirmative	14	17	14	23	
Affirmative	15	8	16	21	
Affirmative	17	21	18	6	
Affirmative					

<b>Deposition of Minh Chi Nguyen August 24, 2018 — CONFIDENTIAL ATTORNEYS' EYES ONLY (portion)</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	18	12	18	13	
Affirmative	31	11	31	23	
Affirmative	37	12	38	2	
Affirmative	52	11	53	12	
Affirmative	56	5	60	19	
Affirmative	62	15	62	18	
Affirmative	63	15	63	21	
Affirmative	64	21	65	19	
Affirmative	71	22	72	2	
Affirmative	72	14	73	7	
Affirmative	99	24	101	3	
Affirmative	101	24	102	5	
Affirmative	106	9	107	6	
Affirmative	109	2	110	18	
Affirmative	113	8	113	23	
Affirmative	146	3	147	18	
Affirmative	151	12	152	13	
Affirmative	154	9	156	4	
Affirmative	156	6	156	19	
Affirmative	157	9	157	19	
Affirmative	158	14	158	21	

<b>Deposition of Minh Chi Nguyen</b> <b>August 24, 2018 — CONFIDENTIAL ATTORNEYS' EYES ONLY (portion)</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
	163	25	165	12	
	168	2	168	19	
	171	22	172	13	
	185	6	185	19	

<b>Deposition of Bryan Lim</b> <b>April 5, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	5	3	5	4	
Affirmative	5	5	5	11	
Affirmative	5	16	6	6	
Affirmative	9	1	12	13	
Affirmative	13	3	13	11	
Affirmative	14	2	14	6	
Affirmative	15	8	15	25	
Affirmative	17	6	18	3	
Affirmative	18	6	18	17	
Affirmative	19	2	19	9	
Affirmative	19	12	19	13	
Affirmative	19	16	20	1	
Affirmative	20	4	20	8	
Affirmative	20	14	20	16	
Affirmative	20	18	20	18	
Affirmative	20	21	21	5	
Affirmative	21	20	23	4	
Affirmative	24	1	24	1	
Affirmative	25	16	27	14	
Affirmative	29	1	29	4	
Affirmative	29	7	29	7	
Affirmative	29	9	29	12	
Affirmative	29	16	29	16	
Affirmative	30	12	30	17	
Affirmative	30	21	30	21	
Affirmative	30	23	30	24	
Affirmative	31	2	31	9	
Affirmative	31	11	31	11	
Affirmative	31	19	31	22	
Affirmative	32	1	32	3	

<b>Deposition of Bryan Lim April 5, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	32	5	32	6	
Affirmative	32	10	33	13	
Affirmative	33	15	33	15	
Affirmative	33	17	35	12	
Affirmative	35	15	36	21	
Affirmative	36	23	38	15	
Affirmative	38	23	39	11	
Affirmative	39	13	39	24	
Affirmative	40	1	40	14	
Affirmative	41	7	42	8	
Affirmative	42	12	42	15	
Affirmative	42	18	42	23	
Affirmative	43	2	43	19	
Affirmative	43	21	43	22	
Affirmative	43	24	44	2	
Affirmative	44	4	44	4	
Affirmative	44	7	44	8	
Affirmative	44	10	45	21	
Affirmative	45	23	46	11	
Affirmative	46	23	46	25	
Affirmative	47	4	47	9	
Affirmative	47	11	47	13	
Affirmative	47	19	48	5	
Affirmative	48	7	48	14	
Affirmative	48	16	51	10	
Affirmative	51	12	51	13	
Affirmative	51	15	52	19	
Affirmative	52	22	54	16	
Affirmative	54	20	54	24	
Affirmative	55	1	55	2	
Affirmative	55	4	55	13	
Affirmative	55	18	55	23	
Affirmative	56	1	56	7	
Affirmative	56	9	56	15	
Affirmative	56	18	56	24	
Affirmative	57	2	57	2	
Affirmative	57	4	57	13	
Affirmative	57	16	57	24	
Affirmative	58	3	58	9	

<b>Deposition of Bryan Lim April 5, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	58	12	59	1	
Affirmative	59	4	59	10	
Affirmative	59	13	59	19	
Affirmative	59	22	59	25	
Affirmative	61	1	62	13	
Affirmative	62	17	62	20	
Affirmative	63	12	63	17	
Affirmative	63	20	64	16	
Affirmative	64	19	65	2	
Affirmative	65	5	66	12	
Affirmative	66	17	67	22	
Affirmative	68	1	68	20	
Affirmative	68	23	68	25	
Affirmative	69	2	69	20	
Affirmative	70	2	72	4	
Affirmative	72	18	77	11	
Affirmative	77	25	78	23	
Affirmative	79	2	81	6	
Affirmative	82	24	83	2	
Affirmative	83	19	83	25	
Affirmative	84	8	85	12	
Affirmative	85	18	85	21	
Affirmative	85	25	87	6	
Affirmative	87	8	88	19	
Affirmative	89	21	90	7	
Affirmative	90	10	91	6	
Affirmative	91	12	91	14	
Affirmative	91	18	91	18	
Affirmative	91	20	93	1	
Affirmative	93	23	95	1	
Affirmative	95	3	95	9	
Affirmative	95	12	96	18	
Affirmative	97	5	98	9	
Affirmative	98	11	99	4	
Affirmative	99	6	99	6	
Affirmative	99	10	100	17	
Affirmative	101	5	101	10	
Affirmative	110	19	111	12	
Affirmative	112	2	112	11	

<b>Deposition of Bryan Lim April 5, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	112	24	113	12	
Affirmative	113	15	113	16	
Affirmative	113	18	114	1	
Affirmative	114	25	115	3	
Affirmative	115	9	115	12	
Affirmative	116	25	117	7	
Affirmative	118	11	118	14	
Affirmative	118	16	118	16	
Affirmative	118	18	119	7	
Affirmative	119	9	119	10	
Affirmative	119	12	119	22	
Affirmative	120	1	120	4	
Affirmative	121	10	121	13	
Affirmative	121	17	121	22	
Affirmative	121	24	122	4	
Affirmative	123	1	123	3	
Affirmative	123	6	123	6	
Affirmative	123	8	123	8	
Affirmative	123	10	123	14	
Affirmative	123	16	123	17	
Affirmative	129	19	123	20	
Affirmative	123	22	124	11	
Affirmative	127	9	128	2	
Affirmative	128	4	128	5	
Affirmative	133	22	134	5	
Affirmative	136	6	136	22	
Affirmative	136	25	137	20	
Affirmative	138	24	140	15	
Affirmative	140	19	141	5	
Affirmative	153	19	153	22	
Affirmative	154	9	155	13	
Affirmative	155	15	155	25	
Affirmative	156	23	162	3	
Affirmative	165	16	165	17	
Affirmative	165	20	166	24	
Affirmative	167	2	167	23	
Affirmative	168	20	169	17	
Affirmative	169	21	170	4	
Affirmative	170	6	170	6	

**Deposition of Bryan Lim**  
**April 5, 2019**

<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	170	19	171	4	
Affirmative	174	14	175	19	
Affirmative	179	2	180	23	
Affirmative	181	4	181	18	
Affirmative	185	9	186	11	

**Deposition of Jonathan Chee**  
**April 4, 2019**

<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	6	4	6	11	
Affirmative	6	22	6	24	
Affirmative	7	12	7	16	
Affirmative	8	10	8	13	
Affirmative	8	18	8	25	
Affirmative	9	15	9	25	
Affirmative	13	2	13	5	
Affirmative	16	6	17	17	
Affirmative	17	23	18	16	
Affirmative	18	1	18	16	
Affirmative	25	5	25	5	
Affirmative	25	7	28	16	
Affirmative	28	18	28	19	
Affirmative	28	21	29	20	
Affirmative	39	18	42	8	
Affirmative	42	19	44	17	
Affirmative	47	4	49	18	
Affirmative	49	21	50	22	
Affirmative	51	1	51	15	
Affirmative	52	17	56	25	
Affirmative	63	18	64	19	
Affirmative	64	24	64	25	
Affirmative	65	3	66	11	
Affirmative	66	13	66	14	
Affirmative	66	16	67	15	
Affirmative	67	18	68	1	
Affirmative	68	5	68	5	
Affirmative	68	7	70	6	
Affirmative	71	4	71	8	

<b>Deposition of Jonathan Chee</b> <b>April 4, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	73	16	73	25	
Affirmative	74	3	74	3	
Affirmative	74	6	74	11	
Affirmative	74	13	74	22	
Affirmative	75	1	75	19	
Affirmative	75	21	76	1	
Affirmative	76	3	76	10	
Affirmative	76	12	76	22	
Affirmative	76	24	76	25	
Affirmative	77	2	78	1	
Affirmative	78	3	78	22	
Affirmative	79	4	79	9	
Affirmative	79	11	79	11	
Affirmative	79	13	79	13	
Affirmative	79	15	79	16	
Affirmative	79	18	79	21	
Affirmative	79	25	80	10	
Affirmative	80	16	82	16	
Affirmative	82	23	82	23	
Affirmative	82	25	82	25	
Affirmative	83	2	83	14	
Affirmative	83	19	83	21	
Affirmative	83	24	84	13	
Affirmative	84	20	85	8	
Affirmative	85	23	86	10	
Affirmative	86	12	86	12	
Affirmative	86	14	94	17	
Affirmative	94	19	94	21	
Affirmative	94	23	95	15	
Affirmative	95	19	97	4	
Affirmative	109	3	110	5	
Affirmative	110	8	110	10	
Affirmative	110	12	110	16	
Affirmative	111	6	112	25	
Affirmative	113	5	113	14	
Affirmative	113	25	114	21	
Affirmative	115	6	115	20	
Affirmative	115	23	115	24	
Affirmative	116	1	116	8	

<b>Deposition of Jonathan Chee April 4, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	116	10	118	12	
Affirmative	118	17	119	3	
Affirmative	119	5	119	18	
Affirmative	119	20	119	21	
Affirmative	120	1	121	5	
Affirmative	121	7	123	2	
Affirmative	123	4	123	17	
Affirmative	123	20	123	25	
Affirmative	148	22	149	14	
Affirmative	149	16	149	20	
Affirmative	150	14	150	14	
Affirmative	150	16	151	20	
Affirmative	156	4	156	23	
Affirmative	157	1	157	1	
Affirmative	157	21	157	24	
Affirmative	160	19	161	2	
Affirmative	161	4	161	7	
Affirmative	161	11	161	17	
Affirmative	163	4	163	25	
Affirmative	164	3	164	9	
Affirmative	164	15	165	15	
Affirmative	165	20	166	11	
Affirmative	167	3	167	6	
Affirmative	167	8	167	16	
Affirmative	168	1	168	14	
Affirmative	168	16	169	8	
Affirmative	169	18	170	7	
Affirmative	170	13	170	14	
Affirmative	170	17	172	11	
Affirmative	172	16	173	5	
Affirmative	174	1	174	21	
Affirmative	178	22	179	13	
Affirmative	180	5	180	13	
Affirmative	182	6	183	9	
Affirmative	183	12	184	1	
Affirmative	186	14	189	13	
Affirmative	189	16	189	23	
Affirmative	190	1	190	8	
Affirmative	190	13	193	17	



<b>Deposition of Jonathan Chee</b> <b>April 4, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	193	21	194	25	
Affirmative	198	12	200	7	
Affirmative	200	9	202	1	
Affirmative	205	5	208	23	
Affirmative	209	13	210	9	
Affirmative	210	11	211	19	
Affirmative	214	1	214	16	
Affirmative	215	3	216	8	
Affirmative	217	2	219	1	
Affirmative	219	11	222	14	
Affirmative	229	5	229	10	
Affirmative	240	5	240	8	
Affirmative	240	10	246	17	
Affirmative	246	23	249	25	
Affirmative	250	3	252	22	

<b>Deposition of Jonathan Chee—Fed. R. Civ. P. 30(b)(6)</b> <b>September 16, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	5	7	5	8	
Affirmative	5	14	5	16	
Affirmative	6	18	6	22	
Affirmative	6	24	7	2	
Affirmative	7	2	7	5	
Affirmative	8	9	8	15	
Affirmative	9	22	12	13	
Affirmative	12	21	12	23	
Affirmative	13	4	13	14	
Affirmative	13	18	14	8	
Affirmative	14	18	14	21	
Affirmative	15	5	16	4	
Affirmative	16	8	16	11	
Affirmative	16	14	18	1	
Affirmative	18	14	18	23	
Affirmative	19	5	21	1	
Affirmative	21	19	22	3	
Affirmative	22	6	22	16	
Affirmative	23	4	24	7	

<b>Deposition of Jonathan Chee—Fed. R. Civ. P. 30(b)(6) September 16, 2019</b>					
<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	24	14	26	14	
Affirmative	26	21	26	23	
Affirmative	27	1	27	15	
Affirmative	27	17	27	25	
Affirmative	28	5	31	17	
Affirmative	32	1	34	8	
Affirmative	34	25	35	10	
Affirmative	35	24	37	10	
Affirmative	37	14	37	15	
Affirmative	38	1	39	3	
Affirmative	39	8	39	15	
Affirmative	39	18	40	6	
Affirmative	40	12	40	23	
Affirmative	41	7	42	6	
Affirmative	42	9	42	12	
Affirmative	42	14	43	16	
Affirmative	43	25	43	25	
Affirmative	44	4	44	6	
Affirmative	44	12	44	23	
Affirmative	45	1	45	10	
Affirmative	46	14	48	1	
Affirmative	48	19	50	17	
Affirmative	50	19	50	24	
Affirmative	51	1	52	6	
Affirmative	52	11	52	11	
Affirmative	53	22	53	23	
Affirmative	53	25	53	25	
Affirmative	54	5	54	8	
Affirmative	54	14	55	11	
Affirmative	56	5	56	12	
Affirmative	56	16	56	24	
Affirmative	57	5	57	8	
Affirmative	57	19	58	6	
Affirmative	58	10	58	23	
Affirmative	58	25	58	25	
Affirmative	59	2	59	18	
Affirmative	60	4	60	16	
Affirmative	61	6	62	22	
Affirmative	63	10	68	19	

**Deposition of Jonathan Chee—Fed. R. Civ. P. 30(b)(6)**  
**September 16, 2019**

<b>Designation Type (Affirmative/Counter)</b>	<b>Begin Page</b>	<b>Begin Line</b>	<b>End Page</b>	<b>End Line</b>	<b>Objection</b>
Affirmative	68	23	69	17	
Affirmative	70	9	70	21	

Dated: ~~September 3~~October 1, 2021.

ARNOLD & PORTER KAY SCHOLER LLP

By: /s/ Joseph Farris

JOSEPH FARRIS

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served a copy of the foregoing DEFENDANTS' AMENDED DISCOVERY AND DEPOSITION DESIGNATIONS email on October 1, 2021.

\_\_\_\_\_  
/s/